

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )  
on Behalf of All Others Similarly Situated, )  
Plaintiff, )  
vs. ) Civil Action No. 3:16-cv-02267  
CORRECTIONS CORPORATION OF ) Honorable Aleta A. Trauger  
AMERICA, et al., ) Magistrate Judge Jeffrey S. Frensley  
Defendants. )  
\_\_\_\_\_  
)

**[PROPOSED] ORDER REGARDING FURTHER SPECIAL MASTER REVIEW**

It appearing to the Court that it would be appropriate to revise the scope of the referral to the Special Master appointed by Order dated July 24, 2020, in order to address concerns raised by the Plaintiffs about certain documents that are identified on Defendants' Privilege Log<sup>1</sup>, it is hereby ORDERED as follows:

1. The Special Master shall also review the following additional documents as part of her review pursuant to the July 24, 2020 Order: Privilege Log Nos. 47, 71-72, 78-81, 86-92, 1757-61<sup>2</sup>;
2. The Special Master shall state in her report whether these documents contain or speak about a specific July 27, 2012 After-Action Report authored by the Federal Bureau of Prisons (as opposed to some other after-action report by another agency or an internal review by

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<sup>1</sup> All references to Defendants' privilege log are to the operative log produced to Plaintiff on July 15, 2020.

<sup>2</sup> In their [Proposed] Order, Plaintiffs' request that the Special Master also review Privilege Log Entry Nos. 1503-04 and 1803-08. These documents are already before the Special Master, thus it is unnecessary for them to be included in any Order regarding an expanded review.

the Defendant Company) and include in her report whether, based on her review, there is any evidence that Defendants reviewed or received the BOP After-Action Report in 2012;<sup>3</sup>

3. The Special Master may request additional documents and information to assist in her inquiry, and the parties are instructed to timely cooperate with any such requests;

4. As with her ongoing review, the Special Master shall also include in her report findings and basic reasoning as to whether each of the documents reviewed pursuant to ¶1 is privileged; and

5. To the extent the Special Master needs additional time beyond the current August 31, 2020 deadline to complete her work, the parties shall submit such request to the Court for the Court's approval.

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THE HONORABLE ALETA A. TRAUGER  
UNITED STATES DISTRICT JUDGE

Submitted by:

s/ Steven A. Riley

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<sup>3</sup> Plaintiff shall provide the Special Master with a copy of the BOP After-Action Report for her reference.

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